California Regional Water Quality Control Board
Santa Ana Region

Linda S. Adams
Secretary for
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Arnold Schwarzenegger
Governor

September 29, 2006

Base Realignment and Closure
Attn: Mr. Darren Newton
BRAC Environmental Coordinator
7040 Trabuco Road
Irvine, California 92618

COMMENTS ON DRAFT FINAL PHASE II REMEDIAL INVESTIGATION REPORT, IRP SITE 1, EXPLOSIVE ORDNANCE DISPOSAL RANGE, FORMER MARINE CORPS AIR STATION, EL TORO, SWRCB GEOTRACKER ID: DOD100136000

Dear Mr. Newton:

We have reviewed the above referenced document, dated June 2006, which we received on July 25, 2006. We have the following comments:

- **EXECUTIVE SUMMARY, Summary Results, Northern and Southern Explosive Ordnance Disposal Training Ranges**, fourth hyphen/bullet, Page vii: It should be noted that petroleum hydrocarbon contamination of the diesel, gasoline, and waste oil range are identified in concentrations that normally require corrective action. Additionally, within the report, groundwater and surface water sample results are reported as having measurable concentrations of petroleum hydrocarbons. Site 1 needs to be added to the petroleum corrective action program for assessment and possible remedy of the petroleum hydrocarbons released at the site.

- **4.5.8 General Chemistry, RI Tier I and Tier III-A Groundwater Sampling and Analysis**, Page 4-116: Nitrate concentrations of groundwater at the site are identified as between 1.7 milligrams (mg)/liter (L) to 20 mg/L. The Regional Board's Water Quality Control Plan (Basin Plan) water quality objective nitrate for the Irvine Groundwater Management Zone (IGMZ) is 5.9 mg/L. Site 1 is located outside and upgradient of the groundwater basin, and is tributary to the basin. If a significant area of Site 1 is a source of nitrate and causes an impact to the groundwater basin at or above the water quality objective, then nitrate is considered a contaminant of concern for Site 1. Site 1 should be evaluated as a source of nitrate contamination to the IGMZ.

- **9 Summary and Conclusions,** *9.1.1.5 Surface Water Contamination*, Number 5 Page 9-4: identifies seven metals that were detected in surface water, at concentrations exceeding the national recommended Water Quality Criteria or risk-based screening values for aquatic life. Exceedances of surface water quality

criteria and screening values were found in the samples taken from surface runoff downgradient of the identified disposal areas. However, in sections **9.1.3 Ecological Risk Assessment** and **9.2.4 Ecological Risk,** the downstream aquatic receptors are not considered. Therefore, we do not concur with your conclusion that the evaluation is complete with regard to protection of aquatic ecological receptors at Site 1. We believe this site is a threat to downstream aquatic receptors, and an evaluation of the magnitude, source, and nature of that threat is appropriate in a remedial investigation.

For any questions, please call me at (951) 782-4494, or send email to jbroderick@waterboards.ca.gov.

Sincerely,

John Broderick
SLIC/DoD Section

cc via email: Richard Muza, U.S. EPA, Region 9
Soad Hakim, DTSC, Office of Military Facilities
Arturo Tamayo, BRAC PMO WEST